

Appl. No. : **10/781,023**
Filed : **February 17, 2004**

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1, 2, 4-7 stand rejected under 35 USC 103 as allegedly being on patentable over Motoshima in view of Cok. Claims 8 and 9 stand rejected over Motoshima in view of Cok and in view of Stasko. Apparently the other claims stand rejected based on similar rationale.

In response, many of the claims are amended herewith to recite more details about the trapezoidal portions that connect between the different modular blocks, and to recite that the edge surfaces have electrical contacts that are exposed thereon.

A hypothetical combination of Motoshima in view of Cok and Stasko would not teach or suggest the claimed combination. Motoshima does teach a modular graphics panel. However, as noted by the rejection, Motoshima has no mechanical interlock portion on the edge surface. Therefore, this system would likely require a frame of some type were somehow installed around the edges of the device, in order to hold the parts together. It would be impractical to obtain proper electrical connection in Motoshima without some kind of additional mechanical structure, such as a frame, for example.

Cok similarly shows such a device with interlocking portions. However, as in Motoshima, the portions in Cok could be

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easily separated from one another, since their shapes do not well hold them together. It would be difficult to maintain a good electrical connection.

Claims like claim 1 define a trapezoidal shape on the edges of the modular block. The inventors recognize that this trapezoidal shape facilitates interlocking, and also holds the parts relative to one another more robustly. Claim 1 defines there are electrical connections on the edge surfaces. This special trapezoidal shape interlocks those edge surfaces together, and holds them in a more robust way. The trapezoidal shape is defined in claim 1 as being a trapezoidal portion with first and second angled portions that extend between said first and second flat surfaces and are non-perpendicular to either of said first or second flat surfaces. As described above, this allows a more robust electrical connection as compared with the cited prior art.

The above has described a hypothetical combination of Motoshima in view of Cok. The Stasko reference shows a trapezoidal rail-style connection that holds together multiple monitors. There is no disclosure or suggestion of electrical connections on the trapezoidal rails of the Stasko reference. In fact, the trapezoidal rails in Stasko were provided solely to hold the devices in mechanical registration with one another. Such is in no way taught or suggested by Stasko, who only

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intended mechanical interlock between the parts, and taught absolutely nothing about an electrical connection.

In fact, the claimed combination would produce an unexpected advantage that is in no way taught or suggested by the cited prior art. Specifically, by using this system with trapezoidal connecting parts, the two flat parts (which have the electronic connection portions thereon) are more robustly held against one another. This in turn allows these devices to be more rigidly interconnected and in a way that is nowhere taught or suggested by the cited prior art.

The use of trapezoidal connection parts, with electrical connections on these trapezoidal connection parts produces a more robust system, not taught or suggested by any fair combination of the prior art, and therefore each of these claim should be allowable.

Claim 1 should be allowable for these reasons, along with the claims that depends therefrom.

Claim 3 should be allowable on its own merits. Claim 3 defines that there are tristate buffers connected to the first and second contacts on the flat surface. The rejection alleges that bidirectional infrared ports are the functional equivalent of tristate buffers. With all due respect, this is incorrect. Infrared ports cannot be shorted out like electrical connections. There is nothing about an infrared buffer that would suggest a tristate buffer. In fact, claim 3 enables electrical connection

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between contacts, which is very different than an optical connection.

Claim 3 has been amended to emphasize that the connections for power distribution and signal distribution are electrical connections located on the flat surface. This further distinguishes over the cited prior art which teaches nothing about tristate buffers. The use of tristate buffers enables prevention of shorting errors and the like in an electrical connection. Nothing in the cited prior art teaches or suggests this kind of system.

Claim 9 already recited the trapezoidal structure, but has been amended to provide more details about that shape, which emphasize its patentable distinctions in a similar way to that discussed above with respect to claim 1. In addition, the tristate buffers defined by claim 16 should be additionally allowable for analogous reasons to those discussed above.

Claims 17-24 have been canceled to obviate the rejections thereto.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed.

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Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

For all of these reasons, it is respectfully suggested that all of the claims should be in condition for allowance. A formal notice of allowance is hence respectfully requested.

If the Examiner believes that communications such as a telephone interview or email would facilitate disposal of this case, the undersigned respectfully encourages the Examiner to contact the undersigned.

Recognizing that Internet communications are not secure, I hereby authorize the USPTO to communicate with me concerning any subject matter of this application by electronic mail (using the email address scott@harrises.com). I understand that a copy of these communications will be made of record in the application file.

Please charge any fees due in connection with this response, (including the one month extension of time paid via EFS), to Deposit Account No. 50-4376, small entity.

Respectfully submitted,

Date: 10/15/07

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